

1 DAVID M. POITRAS – Bar No. 141309
SUSAN K. SEFLIN - Bar No. 213865
2 JESSICA S. WELLINGTON - Bar No. 324477
BG LAW LLP
3 21650 Oxnard Street, Suite 500
Woodland Hills, CA 91367
4 Telephone: (818) 827-9000
Facsimile: (818) 827-9099
5 Email: dpoitras@bg.law
sseflin@bg.law
6 jwellington@bg.law

7 Proposed Attorneys for Chapter 11 Debtor and
Debtor in Possession

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **SANTA ANA DIVISION**

11 In re

12 Mash Studios, Inc.,
13

Case No. 8:24-bk-11048-TA

Chapter 11

14 **OMNIBUS NOTICE OF HEARINGS ON**
15 **FIRST DAY EMERGENCY MOTIONS**

16 **Hearings:**

17 Date: April 26, 2024

18 Time: 11:30 a.m.

19 Place: Courtroom 5B - Via Zoom.gov
411 West Fourth Street
Santa Ana, CA 92701

20
21
22
23 **PLEASE TAKE NOTICE** that on April 24, 2024, Mash Studios, Inc., the chapter 11 debtor
24 and debtor in possession herein (the “Debtor”), filed a voluntary petition for relief under subchapter
25 v of chapter 11 of 11 U.S.C. §§ *et seq.* (the “Bankruptcy Code”). In connection with the Debtor’s
26 bankruptcy filing, the Debtor will be filing the following three emergency motions (collectively, the
27 “Motions”) by no later than 12:00 p.m. on April 25, 2024:

- 28
 - Emergency Motion for Order (1) Authorizing, But Not Requiring, the Debtor to Pay

Prepetition (A) Wages, Salaries, and Other Compensation, (B) Employee Medical, Workers' Compensation and Similar Benefits, and (C) Reimbursable Employee Expenses; and (2) Authorizing and Directing Applicable Banks and Other Financial Institutions to Receive, Process, Honor, and Pay Checks Presented for Payment and to Honor Fund Transfer Requests (the "Wage Motion");

- Emergency Motion for Authority to (A) Use Cash Collateral on an Interim Basis Pending a Final Hearing; (B) Grant Replacement Liens; and (C) Set Final Hearing (the "Cash Collateral Motion"); and
- Emergency Motion for Order (I) Authorizing the Continued Use of the Debtor's Cash Management System, (II) Authorizing the Maintenance of the Debtor's Pre-Petition Bank Accounts, and (III) Requiring Banks to Release Administrative Holds and/or Freezes on the Debtor's Pre-Petition Bank Accounts (the "Cash Management Motion").

PLEASE TAKE FURTHER NOTICE that a hearing will be held on **April 26, 2024 at 11:30 a.m.** before the Honorable Theodor C. Albert, Chief United States Bankruptcy Judge for the Central District of California (Santa Ana Division), in his Courtroom "5B" **via Zoom.gov only** (information below) for the Court to consider the Motions and any objections thereto. Objections may be filed prior to the hearing and may also be presented orally at the hearing on the Motions.

PLEASE TAKE FURTHER NOTICE that if you do not receive a copy of the Cash Collateral Motion, Wage Motion and/or Cash Management Motion via e-mail by 12:00 p.m. on April 25, 2024, you may obtain a copy of the Motions by sending a written request only to the Debtor's bankruptcy counsel BG Law LLP, Attn: Susan K. Seflin, by fax to 818-827-9210 or by email to sseflin@bg.law. If you received this notice via email, then the Debtor's counsel intends on serving you with the Motions via email. You may also be receiving copies of this notice by overnight or regular mail.

PLEASE TAKE FURTHER NOTICE that if you received a copy of this notice, then one or all of the Motions may affect you and/or your rights. Pursuant to Local Bankruptcy Rule 9013-1(h), the failure to appear at the hearing and object to the Motions may be deemed by the Bankruptcy Court to constitute consent to the approval of the relief sought in the Motions.

1 **PLEASE TAKE FURTHER NOTICE** that the hearing on April 26, 2024 at 11:30 a.m. will
2 be via Zoom.gov **only**. The Zoom login and call information is as follows:

3 **Video/audio web address:** <https://cacb.zoomgov.com/j/1609614482>

4 **ZoomGov meeting number:** 160 961 4482

5 **Password:** 321716

6 **Telephone conference lines:** 1 (669) 254 5252 or 1 (646) 828 7666

7 **DATED:** April 24, 2024

8 BG Law LLP

9 By: /s/ Susan K. Seflin

10 Susan K. Seflin

11 Proposed Attorneys for Chapter 11 Debtor
12 and Debtor in Possession

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
21650 Oxnard Street, Suite 500, Woodland Hills, CA 91367.

A true and correct copy of the foregoing document entitled: **OMNIBUS NOTICE OF HEARINGS ON FIRST DAY EMERGENCY MOTIONS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **April 24, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Michael J Hauser** michael.hauser@usdoj.gov
- **Susan K Seflin** sseflin@bg.law
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

****JUDGE'S COPY NOT REQUIRED IF LESS THAN 25 PAGES (GENERAL ORDER 23-01).**

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

SUPPLEMENTAL PROOF OF SERVICE TO BE FILED REGARDING SERVICE VIA OVERNIGHT MAIL AND EMAIL.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 24, 2024

Mela Galvan

/s/ Mela Galvan

Date

Printed Name

Signature